

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER ECKHART and CATHY AREU,	:	
	:	
Plaintiffs,	:	Civil Case No. 1:20-cv-05593
	:	
against	:	
	:	
FOX NEWS NETWORK, LLC, ED HENRY,	:	
SEAN HANNITY, TUCKER CARLSON and	:	
HOWARD KURTZ, in their individual and	:	
professional capacities,	:	
	:	
Defendants.		
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**AFFIDAVIT OF SEAN HANNITY IN SUPPORT OF  
DEFENDANTS' RULE 11 MOTION FOR SANCTIONS**

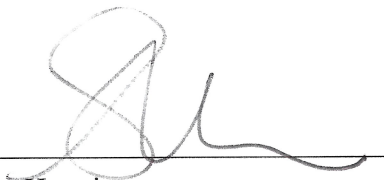
I, Sean Hannity, affirm the following to be true under penalty of perjury pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.9:

1. I have been employed by Fox News Network, LLC since 1996. I serve as the host of *Hannity*, a top-rated primetime program airing on the Fox News Channel weeknights at 9:00 p.m. to 10:00 p.m., among other duties. I am a defendant in the above-captioned matter. I am fully familiar with the facts and circumstances set forth herein and make this Declaration in Support of Defendants' Rule 11 Motion for Sanctions.
2. On March 8, 2018, Plaintiff Cathy Areu came into the studio of *Hannity* to appear as a guest on the program. Accompanying Ms. Areu was an unidentified man that she brought with her into the studio. Between segments of the program, I greeted Ms. Areu and asked to be introduced to the man, as my staff and I are cautious about unknown

persons being in the studio during a program. I asked whether Ms. Areu and the unknown man were in a dating relationship. When they responded with awkward silence, I gave them \$100 to have drinks with each other at Del Frisco's, a nearby restaurant, after Ms. Areu's appearance. Ms. Areu took the money. After the show, Ms. Areu and the man waited for me in the green room and thanked me for the money, stating that they were going to Del Frisco's.

3. In the following weeks, Ms. Areu again appeared on *Hannity* as a guest, and again brought the same male friend with her into the studio. Ms. Areu stated to me that she had a wonderful time at the restaurant with her male friend the last time I gave them money. Out of generosity, I again gave Ms. Areu and her friend money to have drinks on me.
4. Offering to pay for dinner and/or drinks for guests is a regular practice of mine, as witnessed by my staff numerous times. It's my way of saying thank you to guests.
5. At no time did I ever do or say anything to "auction off" Ms. Areu, nor did I say anything remotely "misogynistic" or harassing to or about her.
6. Moreover, at no time did I ever "offer" a "stack of cash" to my "male staff, auctioning off Ms. Areu to anyone in the studio was 'man enough' to take her on a date after work," as alleged by Michael Willemin, in a July 20, 2020 email to the Wigdor Firm's "press list." Willemin's email also contains the false allegation that I "sexually harassed" Ms. Areu.

Dated: 9/24/20

By:   
Sean Hannity